

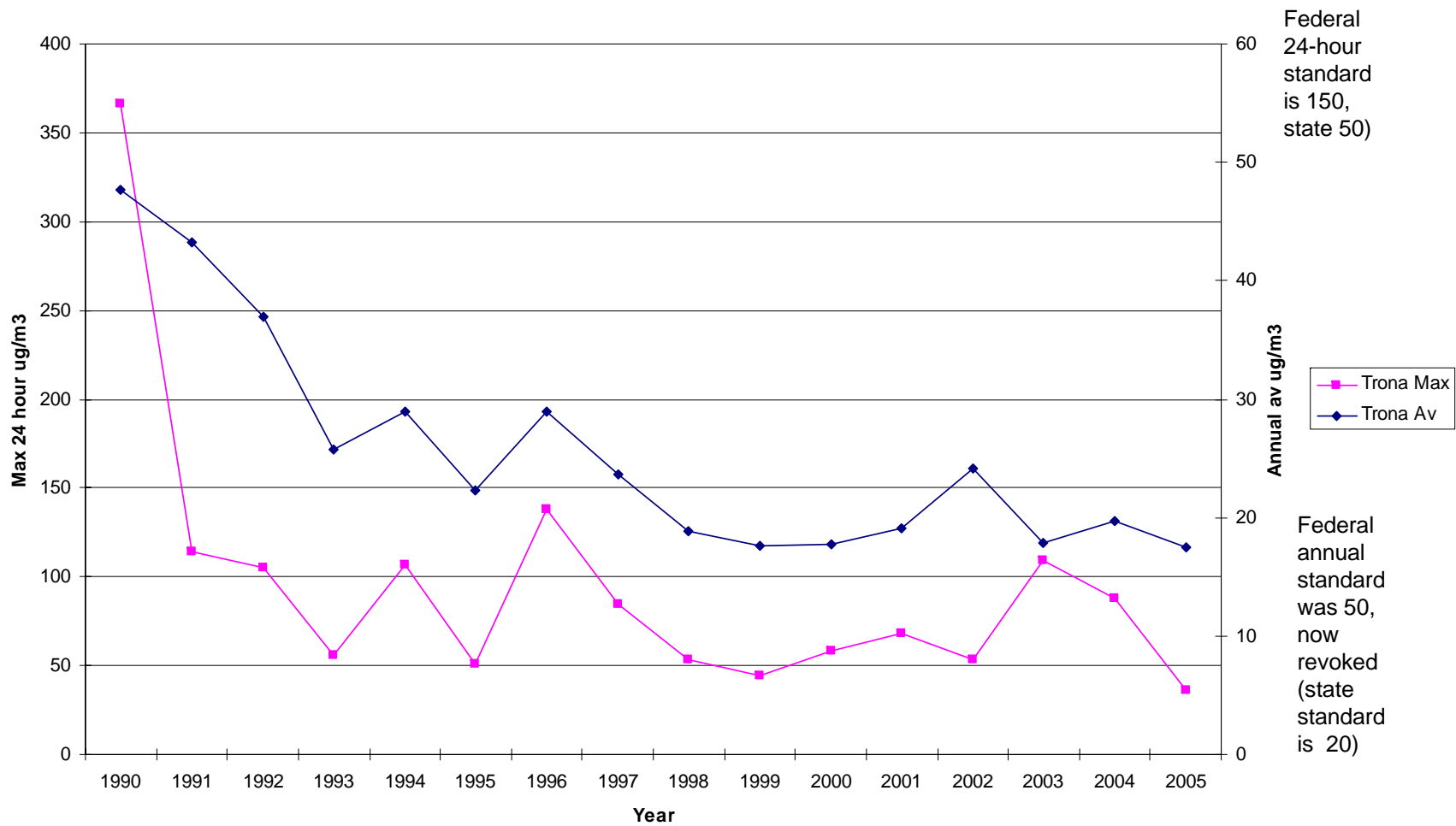
Rules 403.1 & 403.2 and PM_{10} Re-Designation

Alan De Salvio, Supervisor
Planning/Rulemaking/Grants/Engineering
MDAQMD/AVAQMD

Current Dust Designations

- AVAQMD is currently attainment/unclassified for Federal PM_{10} and $PM_{2.5}$ standards
- MDAQMD has three Federal PM_{10} areas: Trona designated attainment in 2002, Palo Verde Valley (Riverside County) not designated, and remainder of District (San Bernardino County) designated non-attainment in 1994.
- All of MDAQMD attainment/unclassified for Federal $PM_{2.5}$

Trona PM10 Trends



Fugitive Dust Rule 403.1 – Trona

- First MDAQMD PM10 RACM Rule, initially adopted in 1994 and tinkered with since
- Designed to control “high day” or short-term dust, not annual average
- General construction controls, specific industrial controls, BLM area requirements and certain paving requirements
- Working well – no Federal exceedances in Trona since rule adoption (to date)

403.1 Federal Approval

- USEPA has not acted on rule either way
- USEPA provided draft rule deficiencies list in 2005
- District circulated updated draft rule to address deficiencies, industry accepted minor changes
- Draft rule currently at USEPA for review (copies available for the curious)

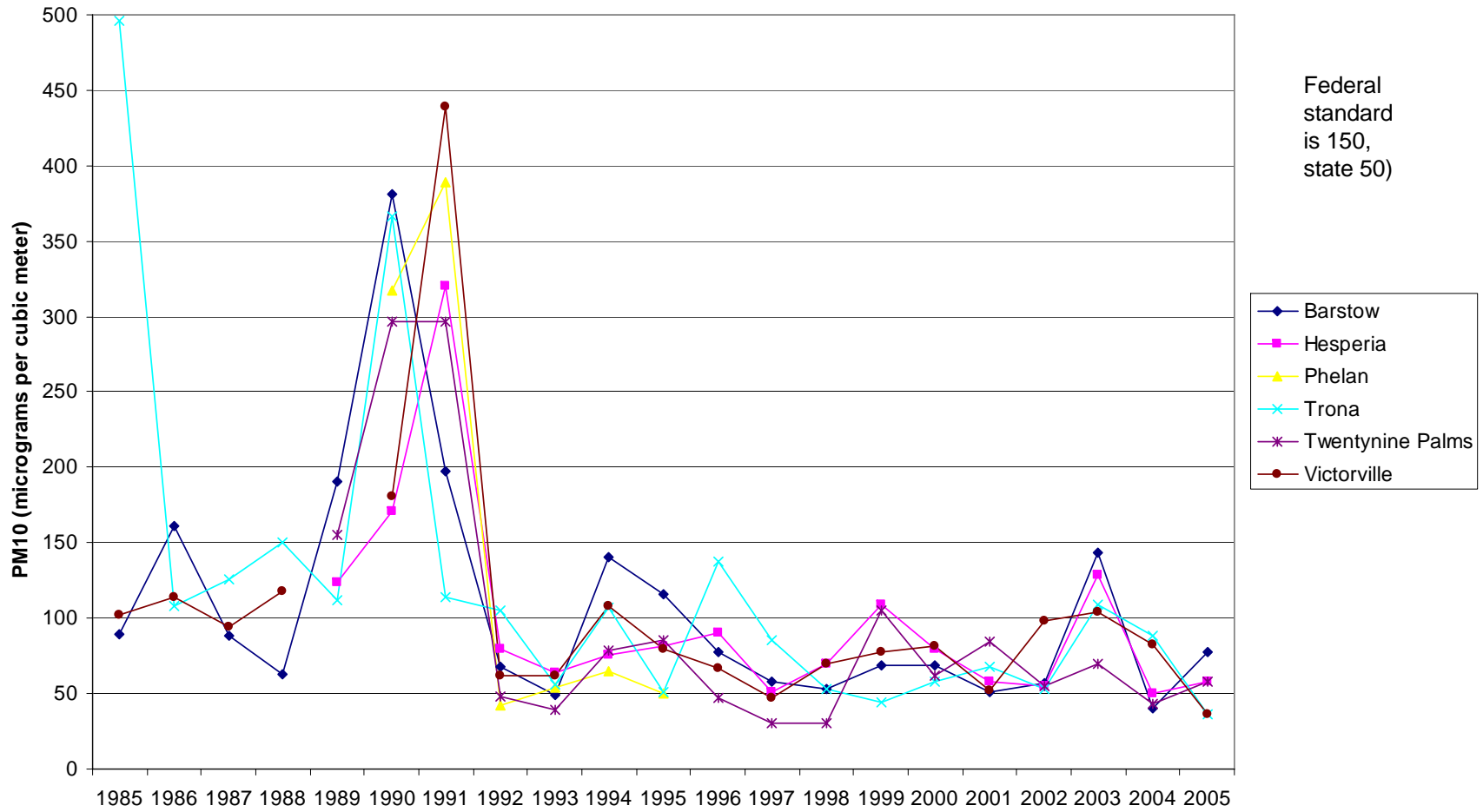
Trona Federal PM₁₀ Status

- District adopted attainment designation and maintenance plan for the area in 1996
- Attainment area, maintenance plan not yet approved (or acted on)
- This plan has a 2010 horizon – revision likely in response to USEPA action
- District expects USEPA approval of revised 403.1 and then approval of maintenance plan for area
- In any event, no NSR or other regulatory change in Trona area expected.

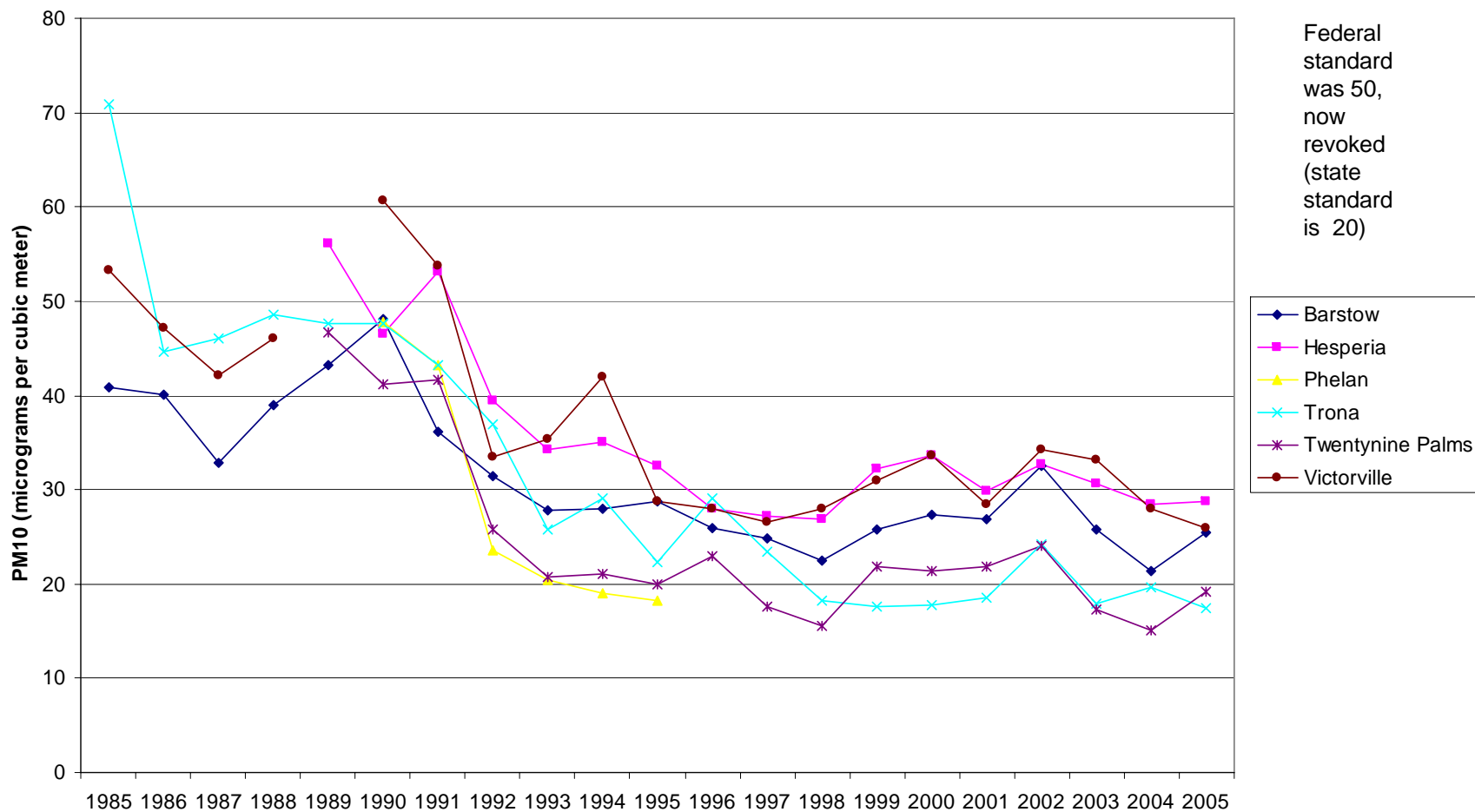
Trona Federal PM_{2.5} Status

- No local monitor
- Area technically attainment/unclassified
- Undetermined PM_{2.5} transport impacts
- PM₁₀ reasonably low – starting to threaten state standard
- No PM_{2.5} changes expected, barring state-initiated actions

Maximum 24 Hour PM10 Trend



MDAQMD Annual Av PM10 Trend



Fugitive Dust Rule 403.2

- Second MDAQMD RACM Rule, adopted in 1996
- Limited geographic applicability
- Asymmetric RACM. Equity issues.
- Flexible. Too flexible?
- Effective, no exceedances since 1991

USEPA and 403.2

- They don't like it and won't approve it
- USEPA provided deficiencies list in 1999
- District prepared draft revised rule in 2003 but adoption process foundered on equity issues and concerns over stringency of proposed construction requirements
- Not broken, haven't fixed

Necessary 403.2 Changes

- Expanded geographic applicability to entire District (excluding only 403.1 area)
- Eliminate flexible enforceability
- Expand industrial RACM from Lucerne Valley to entire District
- Broaden Dust Control Plan requirements
- Draft Rule available for review

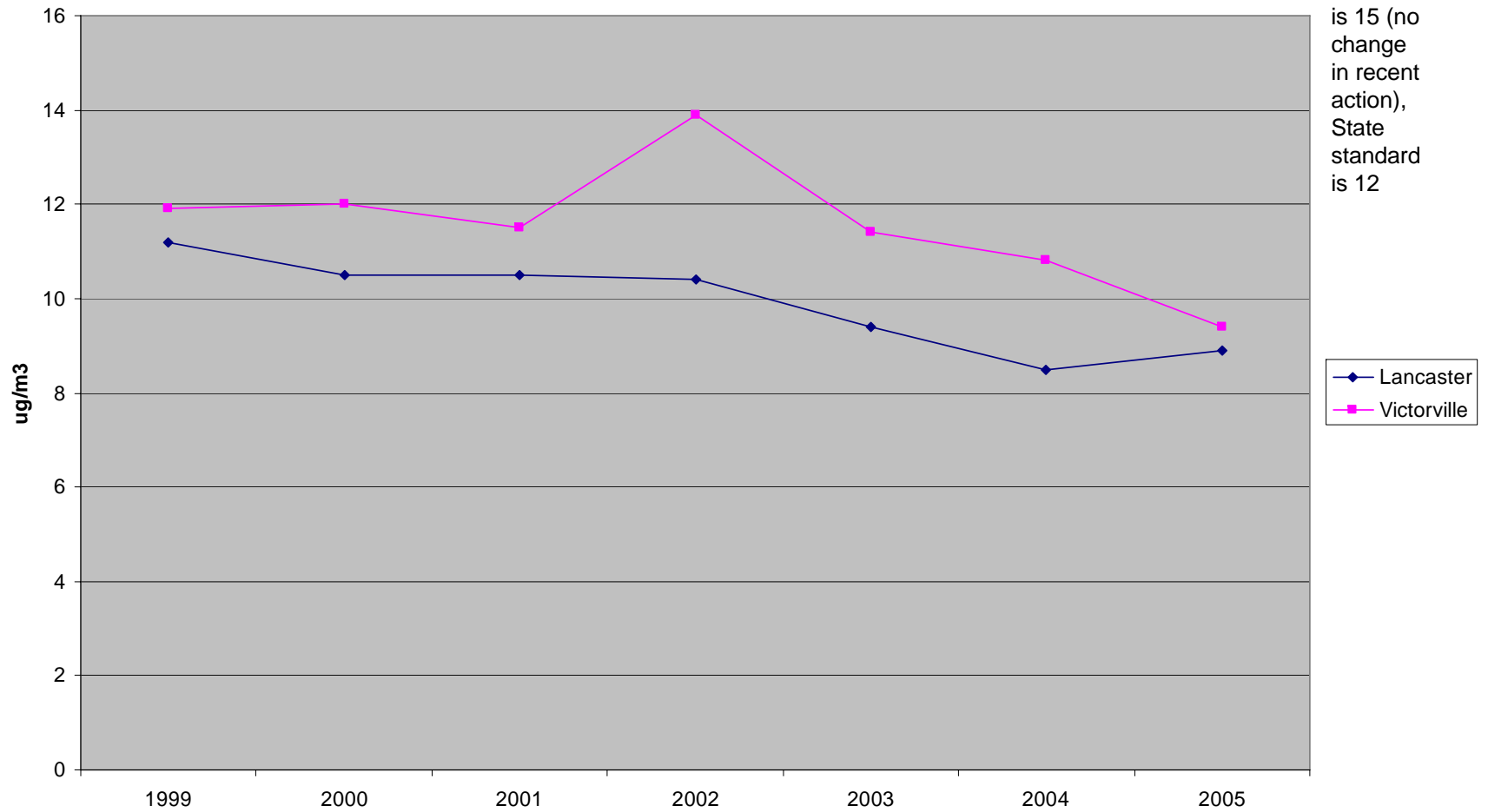
403.2 Federal Approval

- Rule becomes enforceable attainment tool
- Federal approval allows action to request re-designation to attainment
- Maintenance plan not yet prepared
- Growth and goods movement increases will have a bearing

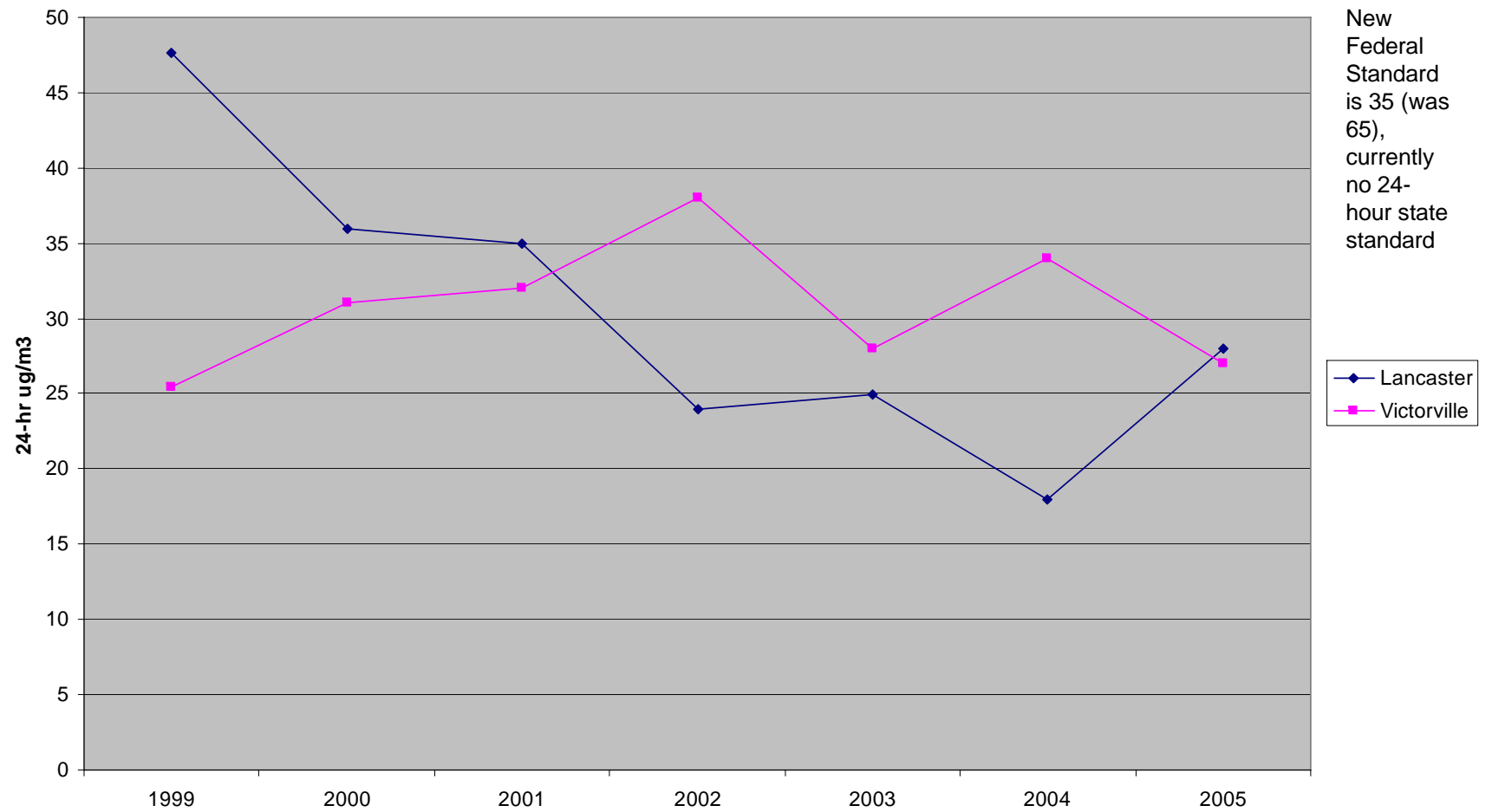
PM₁₀ Re-designation

- PM₁₀ trends are flat but attaining
- Recent USEPA action has no bearing as they retained 24-hour standard and revoked annual standard; region was actually making good progress on annual basis

Annual Average PM2.5



Max 24-Hour PM2.5



PM_{2.5} General

- Looking good with regard to state standards
- Technically a PSD pollutant at this time thanks to attainment/unclassified status
- Not recently exceeding new 35 µg/m³ daily standard
- NSR changes to include PM_{2.5} in response to state standard (and current designation) opens offset Pandora's Box
- Not broken, don't fix

Conclusion

- District is concerned about fugitive dust based on impact (historically) on ambient concentrations
- District is slowly making progress towards attainment of dust standards, and the fugitive dust rules are a necessary part of that progress
- Any questions?